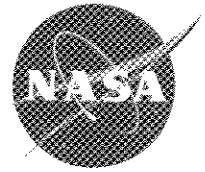


National Aeronautics and  
Space Administration  
**Headquarters**  
Washington, DC 20546-0001



December 29, 2008

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Space Transportation Association (STA) Breakfast, January 8, 2009

On January 8, 2009, the Space Transportation Association (STA) will host and sponsor a breakfast with Dr. Michael Griffin, NASA Administrator, at the Rayburn House Office Building in Washington, DC. Members of the STA include Lockheed Martin, Ball, Aerojet, ATK, Boeing, ITT, USA, PWR, and Wyle. STA's focus is on ensuring reliable cost effective space launch services for NASA, DoD, and the commercial market.

The breakfast will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, White House personnel, Congress, academia, and other Federal agencies. Approximately 300 people have been invited including 30 NASA personnel. The estimated cost of the breakfast, which includes all food and beverages, is \$20.00 per person. I find that the STA event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the breakfast will allow NASA representatives to hear Dr. Griffin speak on NASA's programs and plans, and to discuss the Vision for Space Exploration with the other attendees. Accordingly, NASA employees whose duties do not substantially affect STA or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect STA or its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a large, stylized "A" and "G".

Adam F. Greenstone